

## COD Reengineering Options and Analysis Change History Log - Sorted By Page

#	Suggested Changes	Page	Author	Date	Change Made Y/N	Comments
1	Wow! First time I heard of CBS being reengineered and absorbed by either RFMS or LOS. So, if RFMS=grants, and LOS=loans, where would FWS belong? (Don't think this option [#5] is really under consideration though.)	1.0.1	JoAnn Pease	3-Apr	N	Correct, this is probably not the best option going forward, but all options were listed initially before being ruled out. Discussed with JoAnn - comment noted but no change needed.
2	Paragraph 2, 3rd line: delete "Department supported," go to end of sentence, and append "that involve funds drawn through ED." Or substitute other wording to that effect. This will hurt buy-in right off the bat, because it will signal to internal readers, especially in Case Management, that the contractors may not understand Title IV business proc	1.0.1	Kitty Wooley	3-Apr	Y	Change all "Ed supported Title IV" to "that involve funds drawn through ED"
3	Paragraph 1, 4th line: after "software," insert "running on 3 different platforms and maintained by 3 different contractors."	1.0.1	Kitty Wooley	3-Apr	Y	
4	Paragraph 2, next to last line: in the interests of clarity for readers without a long Title IV background, change "view the errors and make the corrections on the school's system" to "view the records and make error corrections on the school's system."	1.0.1	Kitty Wooley	3-Apr	Y	
5	Paragraph 3, fifth option: append "and the latter two systems are integrated with middleware."	1.0.1	Kitty Wooley	3-Apr	Y	

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6	Paragraph 5, bullet 1: delete "Pell" - I'm not sure it helps our case to refer to "Pell schools" or DL Schools" because it perpetuates a split that we are trying to move beyond (we regulate schools that participate in Title IV).	1.0.1	Kitty Wooley	3-Apr	Y	Replaced bullet with: "Many schools will be hesitant to move toward Just-In-Time funding model: - Currently, fewer than 20 schools using JIT with the Pell Program - Currently, fewer than 10 schools using JIT with the Direct Loan Program
7	The solution for many of the items addressed here may be addressed by a combination COD system and the SFA-FMS system.....This document should really go into that discussion and recognize that these systems are co-dependent and some of the solutions may come out of one or the other or a combination of both. Both IPTs need to work together to assure we are not duplicating effort or working at cross purposes.	1.0.1	Linda Paulsen	3-Apr	N	Noted, but this discussion will take place when more detailed analysis of COD is performed. This deliverable provides a high-level conceptual analysis of the common origination and disbursement process. Comment noted but no change made to document.
8	Assume that Number 1 means credit card infrastructure and/or a FFEL lender software package. Note....When got to 4.02 recognized that it was credit card only....Thus, it seems like somehow we would have talked to a lender also....Don't see that in the package.	1.0.1	Linda Paulsen	3-Apr	N	Option 2, Acquire FFELP/Guarantee agency software package is this option (USA Funds is the guarantee agency we have contacted). No change to document required.
9	Assume that Number 3 means department-funded and custom developed	1.0.1	Linda Paulsen	3-Apr	N	Yes, but no change to document required.
10	Number 4 solution should talk to middleware and the new SFA-FMS as the solution.	1.0.1	Linda Paulsen	3-Apr	N	This would be looked into more detail in the next phase if this is deemed a viable option. No change to document required at this point.

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11	In all cases, the new FMS needs to be identified as part of the solution....Need to add a paragraph to talk about that....All disbursements will be made through that system, and it would "house" the school level (versus student level) information for reconciliation as that system will be the official system of record and be recording the cash that the school will be reconciling to.	1.0.1	Linda Paulsen	3-Apr	N	Integrating with FMS is seen as being part of any solution and would be analyzed further in next phases of work. No change to document required.
12	Statement that Schools have no confidence in Just-in-Time model conflicts with information that 80 schools or so wish to move to JIT in the Pell program for the new year.....Just need to check to be sure that the information is current....Recognize that is the case for some.	1.0.1	Linda Paulsen	3-Apr	Y	Incorporated with change referenced in #6.
13	Benefits to the Department should not be understated (last sentence of the first paragraph). A common process (if done correctly) should greatly simplify school reconciliation and customer service. It could reduce the Department's contracting costs and customer service costs (internally and externally). It should better facilitate the financial statement audit process of cash.	1.0.1	Linda Paulsen	3-Apr	N	These benefits are explained in more detail in Section 2.0-Common Origination and Disbursement. No changes made to document.
14	1st page after table of contents, 2nd paragraph: The first sentence doesn't make sense; probably has too many words.	1.0.1	Marge White	3-Apr	Y	Changed first sentence to read "A common process will give schools one way to provide origination and disbursement data to the Department."
15	2nd paragraph: Next to last sentence: change "suspended" to "rejected"	1.0.1	Marge White	3-Apr	Y	

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16	2nd paragraph, Last sentence: Didn't make sense when I first read it. Maybe you need to add "and send those corrections to the COD in batch."	1.0.1	Marge White	3-Apr	Y	
17	*Needs page numbers. *Needs to be labeled on first page. *In later sections, "Common Origination and Disbursement process" is "Common Origination and Disbursement Process." I recommend using "Process."	1.0.1	Mary Haldane	3-Apr	Y	
18	*Third Paragraph: Should the last sentence not be "no option has been eliminated" not "no software vendor has been eliminated" ?	1.0.1	Mary Haldane	3-Apr	Y	
19	*Fourth paragraph: "2000-2001" should be further in the future.	1.0.1	Mary Haldane	3-Apr	Y	Add "calendar year" before "2000-2001" to differentiate between award and fiscal years
20	*Fifth paragraph: First bullet, I do not believe that it is the Just in Time schools that are having problems. We need to clarify.	1.0.1	Mary Haldane	3-Apr	Y	Change made in request #6
21	*Fifth paragraph: Last bullet, change "Just-in-Time" to "Just-in-Time like model".	1.0.1	Mary Haldane	3-Apr	N	100% JIT is one of the end goals of the COD process - not a JIT like model. No change to document.
22	First paragraph, third line, remove "the"	1.0.1	Rosemary Beavers	3-Apr	Y	
23	Second paragraph--first sentence must be missing something--I don't follow it.	1.0.1	Rosemary Beavers	3-Apr	Y	Change made in request #14

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24	Second paragraph, last sentence implies that schools can correct their systems without correcting ours. That won't work--the systems must stay in sync.	1.0.1	Rosemary Beavers	3-Apr	Y	Change made in request #16
25	End of the introduction--I think we need to point out that for 3500schools, their only process currently is Pell, and we are making all of them change their process so that the 1400 DL schools can have a common process.	1.0.1	Rosemary Beavers	3-Apr	N	Discussed with Rosemary and agreed that comment is noted but no change to document required.
26	*Last paragraph: I do not understand the first sentence, or how it relates to our goal and COD.	1.0.2	Mary Haldane	3-Apr	Y	Reword to: "The challenge is to implement changes that prove the success of the Common Origination and Disbursement concept early. Early success will build excitement and give the Department the momentum to fully transition to the Common Origination and Disbursement Process."
27	Decrease the cost': Don't think that reporting of all CB Program student level data would decrease any schools costs - only increase it. It may decrease ED's costs because it eliminates the majority of the FISAP data, but it would increase the costs tremendously the first year in 'reconciling' student data to the 'last' reportable FISAP summary data. (That would be a HUGE undertaking with associated increased staff costs also.)	2.0.1	JoAnn Pease	3-Apr	N	The cost decrease is meant in aggregate for the 3 programs and not Campus-Based only. Discussed with JoAnn, comment noted but agreed no change to document needed.
28	Page 2.0.1. First sentence....Suggest changing "...distinct school/SFA processes and interfaces....."	2.0.1	Linda Paulsen	3-Apr	N	Comment noted but no change to document required.

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29	Be sure when talking the \$55.5 million that there is an apples to apples comparison.....Is this contracts only, or contracts and SFA personnel.....Could recognize that if include school costs, the costs is MUCH higher.	2.0.1	Linda Paulsen	3-Apr	Y	This amount is the total of the vendor invoice amounts and does not include SFA personnel cost. Change made to document to clarify that these are "contracted vendor costs".
30	Page 2.0.1 Third paragraph...Deal with this more carefully....I have problems with this sentence "Schools are currently able to draw down funds, without reporting students, for months on end" Schools are required by regulation to report disbursements and changes within 30 days of the activity. If schools are able to do this it is because SFA is not enforcing its own requirements. The IG or another outside party that understands this could take a swipe. The Department has ways to monitor and assure better performance by schools.....Changing DL origination levels.....Holding the Pell schools to the reporting of disbursements prior to raising authorization levels.....CB requires year end reporting only and does not require student level reporting at all except for Perkins Loans in NSLDS, and the Department decided not to hold CB funds from schools that did not report....It has the lever, just hasn't enforced.	2.0.1	Linda Paulsen	3-Apr	Y	See change to document referenced in #34.
31	Common origination and disbursement idea came from the old AFMS and was adopted by EASI....Basically to improve accountability, simplify the reporting processes for schools and the Department, reduce costs and to easily support new programs if Congress wished to mandate (SFA built a new system every time a new program was announced.....It was envisioned that a common system would support any program). The last one is an important benefit that is missed in this paper.	2.0.1	Linda Paulsen	3-Apr	N	See change to document referenced in #35.

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32	Last full paragraph, last sentence....The dollars are accounted for....the school has them, and in the audit of the financial statements we show the schools as owing us the money....However, they may not be supported by student level transactions, there are errors because of rounding rules, etc.	2.0.1	Linda Paulsen	3-Apr	Y	Change "unaccounted for" to "owed to the Department by schools"
33	*First paragraph: Campus Based programs should be Campus-Based programs.	2.0.1	Mary Haldane	3-Apr	Y	
34	*Third paragraph: This paragraph implies that all our systems do not have controls; and that just because the school does not report student level data to ED, the funds are unaccounted for. This is not true in all the systems and for all student level data not reported.	2.0.1	Mary Haldane	3-Apr	Y	Take "for months on end" off 2nd sentence. Replace 3rd sentence with 2 sentences: "The Department cannot accurately account for funds without timely reporting of student level disbursements from schools. This means that the Department cannot ensure that all funds are directly "working" for students."
35	*Fourth paragraph: This paragraph needs to acknowledge the past initiative such as Project EASI and Access America.	2.0.1	Mary Haldane	3-Apr	Y	Add "(Project EASI and Access America)" after "processes"
36	*Fifth paragraph: The second through fourth sentences relate only to one of the options ,and we have not chosen one, yet.	2.0.1	Mary Haldane	3-Apr	Y	Change 2nd sentence of fifth paragraph to read: "For example, cost savings could be achieved by implementing the reengineering option to combine the current RFMS, LO, and CBS into one system.
37	Last sentence of first paragraph--"focus on the managing OF the systems,"	2.0.1	Rosemary Beavers	3-Apr	Y	

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38	Third paragraph - The Department of course does have a way, under the current system arrangement, to stop schools from drawing down funds without reporting students. In DL it is level 2 & 3, in Pell and DL it is reimbursement. If the Department decided to require that schools only get money for actual already reported students, we could do that immediately by doing it off anticipated disbursements in origination records. And we could require just in time in a few months with minimal system changes. The Department does not do that because it has enormous political implications, not because of system deficiencies. And those political implications will exist in the new process too.	2.0.1	Rosemary Beavers	3-Apr	Y	See change made in #34
39	Last sentence in paragraph 2 - remove phrase "in their fragmented state" - they are not fragmented they are separate systems--none of them are individually fragmented.	2.0.1	Rosemary Beavers	3-Apr	Y	
40	*Third paragraph: third sentence is not true. We do have ways we just haven't used them effectively. We have been too tied up with cleaning up problems due to conversion of data.	2.0.1	Sarah Utz	3-Apr	Y	See change made in #34
41	Who the heck are Customer Relationship Managers (CRM)? What does that have to do with customer satisfaction, especially when we have a toll free number (NCS) for all technical questions?	2.0.2	JoAnn Pease	3-Apr	Y	See change made in #47
42	Paragraph 4: change "due to the differing knowledge basis required of" to due to the differing knowledge base required for."	2.0.2	Kitty Wooley	3-Apr	Y	

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43	Page 2.0.2 – First paragraph, continued from previous page. Need to say something about the fact that this process combined with the new FMS system will provide all of these things.....The new SFA FMS system is an important part of this solution.	2.0.2	Linda Paulsen	3-Apr	N	Noted, but this discussion will take place when more detailed analysis of COD is performed. This deliverable provides a high-level conceptual analysis of the common origination and disbursement process. Comment noted but no change made to document.
44	*Sixth paragraph: This paragraph is not clear. It also does not highlight the important improved customer service: real time access, accurate data, viewing the total student picture, keeping flexibility, etc. The third sentence is not really a sentence.	2.0.2	Mary Haldane	3-Apr	Y	Bullets from an excerpt for COD that appeared in the Modernization Newsletter were used to rewrite this paragraph on customer service
45	*First full paragraph: You need to change the first part of the first sentence if you change the sixth paragraph.	2.0.2	Mary Haldane	3-Apr	N	See comment for #44 (paragraph was rewritten)
46	*First paragraph: “three funds” should be “three programs.”	2.0.2	Mary Haldane	3-Apr	Y	
47	*Second paragraph: I am not sure who the CMRs are and we have different staff who share this benefit. I would use the generic SFA customer service staff instead of CMRs or “us.”	2.0.2	Mary Haldane	3-Apr	N	See comment for #44 (paragraph was incorporated into rewrite of first paragraph)

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48	*Third paragraph: Change all the “cans” and “coulds” to a form of the verb “will.” This should be consistent throughout the deliverable.	2.0.2	Mary Haldane	3-Apr	Y	
49	Second line remove "thus ensuring".	2.0.2	Rosemary Beavers	3-Apr	N	See comment for #44 (paragraph was rewritten)
50	Last sentence in paragraph 4 - remove completely, current systems pay the right student the right amount at the right time per current guidelines. The COD process is only trying to improve that process and change the way it is currently done.	2.0.2	Rosemary Beavers	3-Apr	Y	
51	End of first paragraph--about accessing multiple databases to find out how much Pell, DL or Perkins student has--can do that in NSLDS now. The real issue is real time data, not multiple databases.	2.0.2	Rosemary Beavers	3-Apr	N	See comment for #44 (paragraph was rewritten)
52	*Second new paragraph: Who are the CRMs? Most people only deal with one system at a time. It can reduce the number of call centers required. This will prevent schools from having to call multiple call centers.	2.0.2	Sarah Utz	3-Apr	N	See comment for #44 (paragraph was incorporated into rewrite of first paragraph)
53	*Third paragraph: The problem isn't the ease of creation it is the timeliness of the data and the timeliness of reporting by the schools.	2.0.2	Sarah Utz	3-Apr	Y	Added comment after 2nd sentence: "Instead of waiting for reports to be run and given to them, Employees will have access to the program data when they need it."
54	Determining Aid Package - How could this work for a student who wants to receive FWS funds?	2.0.3	JoAnn Pease	3-Apr	N	This function has not been defined in that level of detail at this point, but will be going forward. Comment noted but no change to document required.

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55	Page 2.0.3 – Appears to me that somehow the student level information needs to start with the information in CPS or be fully integrated with the application process.	2.0.3	Linda Paulsen	3-Apr	Y	See change made in comment #63.
56	<p>Application:</p> <p>*First paragraph: first sentence, correct the name of the FAFSA to Free Application for Federal Student Aid.</p> <p>*First paragraph: second sentence is really awkward. Reword to: A student sends the FAFSA to the U.S. Department of Education (“ED”) either on-line or via mail.</p> <p>*Second paragraph: second sentence should then be: ED transmits the data and the results to the student (SAR) and electronically to all schools (ISIR) that the student indicated on the FAFSA [3].</p> <p>*Second paragraph: third sentence, “system” should be “systems”</p>	2.0.3	Mary Haldane	3-Apr	Y	
57	<p>Application:</p> <p>*Second paragraph: first sentence needs more detail. Begin the paragraph with a sentence that expands on what ED does, i.e. processes the application: edits, matches, calculating an EFC, etc.</p>	2.0.3	Mary Haldane	3-Apr	Y	Add at beginning of 2nd paragraph: "ED processes the application, editing the data, matching data with outside institutions, and calculating the Expected Family Contribution (EFC). Any records rejected in this process are sent back to the students and schools for correction and resubmission."

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58	<p>Communication of Disbursement:</p> <p>*First paragraph: first sentence, correct “students” to “student’s.”</p> <p>*Second paragraph: first sentence should begin “The school will communicate...”</p> <p>*Second paragraph: second sentence should begin “In other words, the school sends....”</p>	2.0.4	Mary Haldane	3-Apr	Y	
59	<p>Communication of Disbursement:</p> <p>*Second paragraph: begin a new paragraph with “In addition, the...” The paragraph should read:</p> <p>“In addition, the common record eliminates the process of two separate records for origination and disbursement. A school may choose to submit the common record early to pre-screen for edits. Or, a school may choose to wait to submit the common record immediately prior to disbursement when the funds are needed. See “Disbursement” section on page 2.0.4. A school may submit scheduled disbursements via batch at any time, and ED will return acknowledgements within hours [9a]. A school may also submit scheduled disbursements on an individual basis and receive real-time acknowledgements [9b].” This eliminates the paragraph at the top of page 2.0.4.</p>	2.0.3	Mary Haldane	3-Apr	Y	
60	<p>Determining Aid Package:</p> <p>*First paragraph: first sentence, begin the sentence “Next, the school determines the amount....”</p> <p>*First paragraph: last sentence, identify the responsible entity and begin sentence with “The school sends a notification.... package to the ...”</p> <p>*First paragraph: last sentence, “them” should be “him/her.”</p>	2.0.3	Mary Haldane	3-Apr	Y	

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61	Eligibility: *First paragraph: first sentence, () should be (ISIR) and "confirms" should be "confirm." *First paragraph: second sentence, should begin with "Schools confirm.." You should identify the responsible entity at all time.	2.0.3	Mary Haldane	3-Apr	Y	
62	Eligibility: *First paragraph: second sentence, add that the schools confirm eligibility and include the other eligibility criteria.	2.0.3	Mary Haldane	3-Apr	Y	Replace "This is confirmed" in 2nd sentence with "Schools confirm eligibility"  After this sentence add: "In addition, schools assess financial need and confirm a student's eligibility by verifying financial data, ensuring satisfactory academic progress, checking enrollment status, and ensuring the student is participating in an eligible program."  Add after "[5]" in first box: "(exceptions from data mis-matches with external agencies will not be part of this process)"
63	General Comments: *Add what the boxes are meant to indicate. *Add what the [#] mean and where to find them. *Need to make this section clearer and grammatically correct.	2.0.3	Mary Haldane	3-Apr	Y	Explanation added to botton of 2.0.2
64	First box, having to do with correcting student record on-line. This is a CPS change, not COD. Want to be careful that we don't commit to it unless CPS is on board.	2.0.3	Rosemary Beavers	3-Apr	Y	Added footnote to indicate that cooperation from CPS is needed for this functionality

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65	Page 2.0.4 – First box – 9b – Need definition of acknowledgement – Does it mean that SFA has received the records or does it mean that SFA has received and edited the records? May also want to add something on this page about post eligibility edits/checks where we provide schools with an update on a student's eligibility (if they defaulted on a loan).....Seems like it belongs as part of this process.	2.0.4	Linda Paulsen	3-Apr	Y	See change to document referenced in #59.
66	Pre-Disbursement Eligibility Checks: *Second paragraph: first sentence, "is able to" should be "will." *Second paragraph: last sentence needs a period.	2.0.4	Mary Haldane	3-Apr	Y	
67	Resolving Rejects: *Second paragraph, first sentence does not make sense.	2.0.4	Mary Haldane	3-Apr	Y	Change 1st sentence to: "All edits in the current systems will be reviewed to determine whether they are required or provide value. The end result of this analysis will be a smaller group of edits going forward."
68	Second box: Change first sentence to "As part of this process all edits are under review, in hopes that there will be a smaller group of edits which are all either required or value-added."	2.0.4	Rosemary Beavers	3-Apr	Y	See change in comment # 67.
69	Third box--again, a CPS issue which they need to be on board with if it is going to be put into our business case.	2.0.4	Rosemary Beavers	3-Apr	Y	See change to document referenced in #64.

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70	First box- change "school who" to "school that." Make this change global throughout all documents!!	2.0.5	Kitty Wooley	3-Apr	Y	
71	Disbursement: *First paragraph: first sentence, this is not true if the choose the first option in this section.	2.0.5	Mary Haldane	3-Apr	Y	Change 'confirm" to "report"
72	*Change Records: Does this also include adjustments to disbursement amounts.	2.0.5	Sarah Utz	3-Apr	N	Yes, this does include changes to disbursement amounts. No change to document needed.
73	*Close Out/Reconciliation: This isn't good enough, we will need to send this to them regularly or we will continue to have a reconciliation/close out problem.	2.0.5	Sarah Utz	3-Apr	Y	Replace this section with: "After each disbursement of cash, schools will sent an electronic file indicating those students for whom funds were released. Schools will also be send monthly reconciliation reports, indicating student activity for the month as well as beginning and ending balances by fund and other pertinent reconciliation data." (note: this section should not be in a box since it does not represent a change from the current process.) The following should be in a box: "Additionally, schools will have the option of requesting these reconciliation reports at any time as either a year-to-date or date range electronic file."

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74	Close Out/Recon - Isn't the sample date of 8/1/00 a bit aggressive? Our Congressional mandate of reporting FISAP data is October, but it's based on schools' data of JUNE 30 - Not August 1!	2.0.6	JoAnn Pease	3-Apr	Y	Same as change made in #78
75	Access to Data - What is OLAP?? Will this become a mandatory requirement for all schools?	2.0.6	JoAnn Pease	3-Apr	Y	Added after "In addition," 3rd sentence, "for schools that wish to do complex analysis". Also, changed "OLAP" to On-line Analytical Processing (OLAP)".
76	Page 2.0.6 – Close out and reconciliation – The SFA FMS will still be the final system of record of a school's advance/cash balance/receivable that an auditor will be auditing to (looking for the audit trail to the feeder system) – Will need to recognize SFA FMS as part of the solution.	2.0.6	Linda Paulsen	3-Apr	N	Noted, but this discussion will take place when more detailed analysis of COD is performed. This deliverable provides a high-level conceptual analysis of the common origination and disbursement process. Comment noted but no change made to document.
77	4th box – Need to provide schools with an option of reporting earlier than 8/1/2000.	2.0.6	Linda Paulsen	3-Apr	Y	Same as change made in #78
78	Close Out/Reconciliation: *Second paragraph: 8/1/00 is unrealistic.	2.0.6	Mary Haldane	3-Apr	Y	Change "processing" to "award" and remove "(8/1/00)"
79	Last box--remove "the" (second word)	2.0.6	Rosemary Beavers	3-Apr	Y	
80	Example 1--mentions five days for submission of records, earlier narrative mentioned four. Please pick one.	2.0.7	Rosemary Beavers	3-Apr	Y	Changed number of days to 4.

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81	Example 1--last sentence (true for all three examples)--add apostrophe to schools (make it "school's").	2.0.7	Rosemary Beavers	3-Apr	Y	
82	Example 1, last line, make it via AN ACH/FedWire.	2.0.7	Rosemary Beavers	3-Apr	Y	
83	Note on all three examples--in example 1, they would still have to do confirming record for each subsequent disbursement; for example 2, they would still need to report once for each disbursement; and for example 3, they would still need to access the web before each disbursement. So please don't try to sell this as a reduction in the number of times a school needs to report. They MIGHT go from three to two (if their business case supports that), but many schools seem to think (and these examples are vague enough) that they will only need to report once a year for their students, regardless of number of programs or number of disbursements.	2.0.7	Rosemary Beavers	3-Apr	N	Discussed with Rosemary and agreed that comment is noted but no change to document required.
84	Second line - We want to also track (again, a Congressional requirement) of under use of funds at a school. This fits into other waiver options for CB.	2.0.8	JoAnn Pease	3-Apr	Y	Add "under use of funds" to end of line
85	Column headings, "As Is" should be centered over the Pell, C-B, and DL headings. "To Be" should be centered over the COD heading. Same with all other charts of this type.	2.0.8	Kitty Wooley	3-Apr	Y	

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86	Page 2.0.7 – Could not understand this chart.....Assume the “As Is” and “To Be” lines are wrong that that the “To Be” lines were to include only the last column.....Com Orig & Disb. Am assuming that this is really a combination between the new Com Orig & Disb System and the new SFA FMS.....May need to make that clearer. Comments on items:	2.0.8	Linda Paulsen	3-Apr	Y	Same as change made in #85
87	Book loans – system provides support/documentation for booking loans but does not actually book them...That occurs in the servicing system.	2.0.8	Linda Paulsen	3-Apr	Y	Change to "Forward complete loans to servicing"
88	Support Common student identifier – School and ED assigned – I believe that the FFEL community should also be a part of this decision process. 'Manage cash with GAPS/FMS – I actually believe this will be a relationship between the COD and the SFA FMS.	2.0.8	Linda Paulsen	3-Apr	N	Comment noted but no change to document required.
89	The first line of heading in the table appears to be off.....I think "As Is" needs to cover the Pell, CB and DL columns, and "To Be" should be above only the COD column.	2.0.8	Marge White	3-Apr	Y	Same as change made in #85
90	Why are real basic processes like receive and ack origination/change/disbursement records lined out?	2.0.8	Marge White	3-Apr	Y	Text added to document to explain why records are lined out (some are eliminated, some are replaced with functionality in the new COD system)

## COD Reengineering Options and Analysis Change History Log - Sorted By Page

#	Suggested Changes	Page	Author	Date	Change Made Y/N	Comments
91	*The first three columns should be "As Is." *You are eliminating the business processes of (s) take(s) their place.	2.0.8	Mary Haldane	3-Apr	Y	Same as change made in #85
92	*Is it correct that we are eliminating imaging?	2.0.8	Mary Haldane	3-Apr	Y	No. Documents will be imaged, they just will not be sent to other systems. Split into 2 rows: "Image Documents" and "Transmit images to other places".
93	Add CB to "Provide conference support" since we are the only program that does this totally in house - without the help of contractor support!	2.0.9	JoAnn Pease	3-Apr	Y	
94	Calculate and process ACA' - How will this work under COD for Campus-Based if the schools elect to transfer funds between programs?	2.0.9	JoAnn Pease	3-Apr	N	This function has not been defined in that level of detail at this point, but will be going forward. Comment noted but no change to document required.
95	Balancing (on-going reconciliation) with schools – If talking cash, this will be dependent on information in the SFA FMS.	2.0.9	Linda Paulsen	3-Apr	N	Comment noted but no change to document required.
96	Establish and run computer production cycles – Will also be dependent on SFA FMS.	2.0.9	Linda Paulsen	3-Apr	N	Comment noted but no change to document required.

## COD Reengineering Options and Analysis Change History Log - Sorted By Page

#	Suggested Changes	Page	Author	Date	Change Made Y/N	Comments
97	Many of these are the same as above, so just need to recognize that we need to keep the two IPTs together in order for SFA to be successful in this. For example – Maintain FISAP data.....The SFA FMS should have a subsidiary ledger to support the Perkins loan program.	2.0.9	Linda Paulsen	3-Apr	N	Comment noted but no change to document required.
98	Same question about lined out processes.	2.0.9	Marge White	3-Apr	Y	Same as change made in #90
99	Provide conference support should have X in all columns.	2.0.9	Marge White	3-Apr	Y	
100	*Provide conference support should have Xs in all columns.	2.0.9	Mary Haldane	3-Apr	Y	Same as change made in #99
101	*Will COD eliminate the need to process FISAPs?	2.0.9	Mary Haldane	3-Apr	Y	Same as change made in #90
102	DL should have an X in "conference support"	2.0.9	Rosemary Beavers	3-Apr	Y	Same as change made in #99
103	Pell should NOT have an X in "references"	2.0.9	Rosemary Beavers	3-Apr	Y	Rosemary thought this meant references needed to secure a loan, not reference materials; change to "Reference Materials"
104	Both Pell and DL should have X in Correspondence	2.0.9	Rosemary Beavers	3-Apr	Y	

## COD Reengineering Options and Analysis Change History Log - Sorted By Page

#	Suggested Changes	Page	Author	Date	Change Made Y/N	Comments
105	*Facilitate cancellations: We have to allow for this in DL because schools must be able to do adjustments indefinitely due to the change in the 120-day rule.	2.0.9	Sarah Utz	3-Apr	N	For Direct Loans, Sarah mentioned that there has been some discussion over whether this is a function of loan origination or loan servicing. These issues will be resolved during definition of detailed requirements. Comment noted but no change to document needed.
106	Benefit #15, can this be reworded? I can't come up with a good substitute, but I don't think this will be understood widely.	3.0.1	Kitty Wooley	3-Apr	Y	Changed to "Ability to drawdown less than the approved amount of funds (in order to minimize the potential for excess cash)"
107	Page 3.0.1 Somehow up front should have the thought that the schools own business processes and systems should support a common process better, or the thought that this is really going to be easier for them.	3.0.1	Linda Paulsen	3-Apr	N	Some schools will have to reengineer their processes to use the new common record layout and support JIT. Comment noted but no change to document required.
108	*The page needs to be labeled to match the TOC.	3.0.1	Mary Haldane	3-Apr	Y	

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#	Suggested Changes	Page	Author	Date	Change Made Y/N	Comments
109	*#14: Maybe. We still have no control over their internal processes that cause many of the problems now. If the offices within the school aren't working together, this isn't doing away.	3.0.1	Sarah Utz	3-Apr	N	The concern here is that the business office making disbursements does not communicate well with the financial aid office sending in records indicating which students received these funds. Without a substantial change in this communication and business processes at certain schools, a new COD process will not fix this problem. Noted, and this concern will be addressed in implementation plans for the new COD system and process. No change needed to this document.
110	Lengthy reconciliations - this is not a cost factor for CB. We have automated the process and it takes less than 10 minutes per month to do. In no way will the common process be able to match that cost for our CB Program area!	3.0.2	JoAnn Pease	3-Apr	N	The cost factor is meant in aggregate for the 3 programs and not Campus-Based only. Discussed with JoAnn, comment noted but agreed no change to document needed.
111	No access to funds" - I disagree that the potential risks low. In fact, it will become a bigger risk under COD because we forward fund schools.	3.0.3	JoAnn Pease	3-Apr	N	The risk factor is for the common process where 100% of schools are using the common process and JIT. Discussed with JoAnn and agreed no change to document needed.
112	Asterisked footnote, for more clarity, BOLD "alleviate potential" and "mitigate impact" and change "minimal" to "low" (less classy, but I think will make the "Low/High*" designation more quickly understood).	3.0.3	Kitty Wooley	3-Apr	Y	

## COD Reengineering Options and Analysis Change History Log - Sorted By Page

#	Suggested Changes	Page	Author	Date	Change Made Y/N	Comments
113	#2 star 3 - No access to funds...Potential is low, I believe it is high	3.0.3	Rosemary Beavers	3-Apr	Y	Discussed with Rosemary and agreed to change to Medium.
114	#4 - Software vendor is unable to modify system to support process - potential is low, with past performance as proof I believe it high	3.0.3	Rosemary Beavers	3-Apr	Y	The potential for this risk should be increased from "Low", but since SFA is working more closely with these vendors than in the past, the potential is not "High". Potential was changed to "Medium".
115	Schools less trouble reconciling... - I see a bigger problem if both the FAA's and Business Offices can't view the same information at the same time. We need to push for both schools areas to have this information - not just the business office or loan officer.	3.0.4	JoAnn Pease	3-Apr	N	Noted, but no change to document required.
116	SFA/CFO ...better reports to Congress... - I see a much more complicated reconciliation process for COD under CB that our current process.	3.0.4	JoAnn Pease	3-Apr	N	Though COD creates a more complicated reconciliation for Campus Based Programs, COD will allow SFA to provide better, detailed reports to Congress which is a benefit. Comment noted but no change to document required.

## COD Reengineering Options and Analysis Change History Log - Sorted By Page

#	Suggested Changes	Page	Author	Date	Change Made Y/N	Comments
117	Benefit #1, are we really talking about closing cases more quickly (which I'm not sure anyone would believe - it sounds glib), or are we talking about getting fewer callbacks, assuming the contractor fixes the staffing pattern problem? I wrote this Benefit before we went to the LOC - what do you think?	3.0.4	Kitty Wooley	3-Apr	Y	Changed "close cases" to "resolve issues" , and "quickly" to "efficiently"
118	Page 3.0.4. – Benefits Number 5...Put that the funds advance to schools will be more timely accounted for, versus “less money unaccounted for”.	3.0.4	Linda Paulsen	3-Apr	Y	
119	*Benefits #2: What does this mean? Inability to obtain data? They do not focus on systems now. Do you mean Account Managers?	3.0.4	Sarah Utz	3-Apr	N	Discussed with Sarah and she agreed this makes sense for case managers. No change to document needed.
120	Risk #6: I'm having trouble with this. It does not seem sufficiently clear. I'm concerned about the decision-makers who don't have a Title IV background understanding it. And assuming it is true as worded, should the "Unknown" Potential be changed to "Cannot be known"?	3.0.5	Kitty Wooley	3-Apr	Y	<p>Changed text to : "School submits records for all potential recipients because it is not sure which students will enroll. If a record is submitted and the student does not enroll, the school has received funds in excess of true need"</p> <p>Kitty agreed to keep risk potential as "unknown" with text change</p>

## COD Reengineering Options and Analysis Change History Log - Sorted By Page

#	Suggested Changes	Page	Author	Date	Change Made Y/N	Comments
121	#1 all three stars - Potential is low and ability to control is high, I believe potential is either high or medium, and ability is low or medium	3.0.5	Rosemary Beavers	3-Apr	Y	The potential for the items in the first 2 sub-bullets to happen is still low because these have been identified as challenges up-front and will be addressed in the implementation plan of the new COD system, therefore the ability for SFA to control remains high. The potential of the 3rd sub-bullet was changed to medium because funding will need to be approved to address this need.
122	#2 possibly the most important thing, potential should be HIGH	3.0.5	Rosemary Beavers	3-Apr	N	Since this risk has been identified up-front with plans to address this in the next work effort, the potential for this risk remains low. No change made to document.
123	#4 inability to make required changes to statutes - potential is low, I believe it is high	3.0.5	Rosemary Beavers	3-Apr	Y	Potential changed to medium and not high because we have not identified that changes necessarily have to be made to statutes.
124	*#2:I would say the potential is high.	3.0.5	Sarah Utz	3-Apr	Y	Same as change made in #122
125	*#6: High in some cases.	3.0.5	Sarah Utz	3-Apr	N	Discussed with Sarah and agreed that this should remain medium. No change to document.

## COD Reengineering Options and Analysis Change History Log - Sorted By Page

#	Suggested Changes	Page	Author	Date	Change Made Y/N	Comments
126	#4 - What about students relationships with schools - especially if the student wants to verify a teacher cancellation at one school?	3.0.6	JoAnn Pease	3-Apr	N	Comment noted, but discussed with JoAnn and no change to document required.
127	Benefit #1: Do we need to define "exception students"?	3.0.6	Kitty Wooley	3-Apr	N	No change - audience will be aware of exception students
128	Benefit #2: Re "check account status/history," is this a place where we need to manage expectations by separating the concepts of current status and history in case our business rule formulation precludes students having access to real-time account data? Especially since this sounds like it's going to be a hot button with schools?	3.0.6	Kitty Wooley	3-Apr	Y	"status" removed from text so that only "history" is referred to here
129	Page 3.0.6 – Benefit for students are that they can report discrepancies earlier because they have access to the data that we have in our system earlier. In reality this can be added to 3.0.4. Could be an excellent internal control addition for case management.	3.0.6	Linda Paulsen	3-Apr	N	It has not been determined if students will be able to see just their financial aid history, or the status of their financial aid package before it is awarded for the academic year. Therefore, they might not be able to report discrepancies earlier. This will be determined in further detailed requirements analysis. Comment noted but no change to document required.
130	#5 - I disagree that there is a low potential risk during conversion. In fact, just the opposite will be true for Campus-Based moving from 'summary' school data to detailed student data.	3.0.7	JoAnn Pease	3-Apr	Y	Increased potential from "low" to "medium"

## COD Reengineering Options and Analysis Change History Log - Sorted By Page

#	Suggested Changes	Page	Author	Date	Change Made Y/N	Comments
131	#1 & #2 - ability to control is high, I believe it is low to medium	3.0.7	Rosemary Beavers	3-Apr	Y	For #1, no change was made since we feel SFA has high degree of control to enable schools (through training and phased implementation) get to the point where they can submit records prior to disbursement. For #2, control was changed from "high" to "medium".
132	#5 - data integrity issues related to any required conversion - potential is low, I believe it is EXTREMELY high	3.0.7	Rosemary Beavers	3-Apr	Y	Same as change made in #130
133	*#1: Depends on which current system you are referring to. *#4: This is very likely to happen. *#5: This would only be low if we start fresh with a new year and contractor to process with old systems for previous years.	3.0.7	Sarah Utz	3-Apr	N	Comments noted, but no change to document required.
134	Add Benefit #5? "Makes fraud more difficult. Under routine circumstances, schools will not be able to draw funds up to an initial authorization without providing supporting documentation."	3.0.8	Kitty Wooley	3-Apr	Y	
135	Benefit #3: This sounds weak rather than convincing. How about "Addresses Congress's charge to integrate legacy systems" instead?	3.0.8	Kitty Wooley	3-Apr	Y	Change text to: "Provides evidence that PBO can address Congress' charge to integrate legacy systems"
136	Cost #1: insert "of" between "loss" and "interest." Insert "on" between "interest" and "funds."	3.0.8	Kitty Wooley	3-Apr	Y	Same as change made in #137

## COD Reengineering Options and Analysis Change History Log - Sorted By Page

#	Suggested Changes	Page	Author	Date	Change Made Y/N	Comments
137	#1--change to "Opportunity costs and lost interest on funds. . ." Also, I'm not sure that's true--I think we get the interest back. Is this really a cost of money issue? We're giving out loan funds from treasury earlier than we need to? I think this needs a little more thought.	3.0.8	Rosemary Beavers	3-Apr	Y	
138	Weren't we going to include on each of these pages, a statement that we are assuming 100% implementation? Because I thought there was consensus that the ability to have greater fiscal integrity depends on that.	3.0.9	Kitty Wooley	3-Apr	Y	Added "(100% of schools using the common process)" to end of asterisk note at top of 3.0.1, 3.0.4, 3.0.6, and 3.0.8
139	Strike Option D, which cannot be done due to issues with Campus-Based.	4.0.1	Kitty Wooley	3-Apr	N	Despite the fact that it is not an optimum solution, it is an option that we need to list as a possibility and then rule out for our analysis. No change made to document.
140	Add Option F: Build new system (if we think it's a real option).	4.0.1	Kitty Wooley	3-Apr	Y	
141	Page 4.0.1. – Still need to understand the new SFA FMS system and the impact on this process.	4.0.1	Linda Paulsen	3-Apr	N	Noted, but this discussion will take place when more detailed analysis of COD is performed. This deliverable provides a high-level conceptual analysis of the common origination and disbursement process. Comment noted but no change made to document.
142	*The page needs to be labeled to match the TOC.	4.0.1	Mary Haldane	3-Apr	Y	

## COD Reengineering Options and Analysis Change History Log - Sorted By Page

#	Suggested Changes	Page	Author	Date	Change Made Y/N	Comments
143	*First paragraph, second sentence should not just refer to "loan" origination since we are including Pell.	4.0.1	Mary Haldane	3-Apr	Y	Word "loan" removed from sentence
144	In none of the discussions in section 4 does it mention compliance with laws and regulations as a requirement for consideration.	4.0.1	Rosemary Beavers	3-Apr	N	This is included in support of Title IV programs. No change made to the document.
145	*Systems Evaluated: first paragraph, there is no comma after (ALS). *Systems Evaluated: second paragraph, first sentence, "systems" should be singular.	4.0.2	Mary Haldane	3-Apr	Y	
146	In discussing acquiring a financial services industry COTS software package in section 4, it does not mention the \$42 million dollar price tag initially proposed by Total Systems to implement their services for Access America. One would think they would do it again, given the chance. Any savings in modernization would be obliterated by another such proposal.	4.0.2	Rosemary Beavers	3-Apr	N	Comment noted, but no change to document required.
147	Need period at the end of the Total Systems paragraph  Benefits column--remove "will receive" from first bullet  Remove the "d" from reduced in the second bullet (true every time this is repeated)	4.0.2	Rosemary Beavers	3-Apr	Y	

## COD Reengineering Options and Analysis Change History Log - Sorted By Page

#	Suggested Changes	Page	Author	Date	Change Made Y/N	Comments
148	*Systems Evaluated: second paragraph, last sentence should have a comma after "past."	4.0.3	Mary Haldane	3-Apr	Y	
149	Probably don't want my opinion on these options, but you should know that this is what we basically did in acquiring the AFSA servicing system, and it has proven to be immensely expensive.	4.0.3	Rosemary Beavers	3-Apr	N	Comment noted, but no change to document required.
150	Title implies that someone believes that someone other than the Department is funding the other options. Please remove the reference to ED-funded or clarify what you mean!!	4.0.4	Rosemary Beavers	3-Apr	Y	
151	The cost to reengineer the CBS is there in whatever option is chosen, right? I think it needs to be mentioned every time.	4.0.4	Rosemary Beavers	3-Apr	Y	Add Italicized note at bottom of 4.0.1: "Note: Options A-F each require the Campus-Based System to be reengineered."
152	See comments to introduction page	4.0.6	JoAnn Pease	3-Apr	Y	Correct, this is probably not the best option going forward, but all options were listed initially before being ruled out. Discussed with JoAnn - comment noted but no change needed.
153	MANY of these bullets sell products for servicing a portfolio. Only the second bullet under origination, and items 3, 4, and 6 have real applicability to COD. Lets not put a lot of stock into best practices that worry about application, bill presentation, credit scoring, and data warehousing--unless the scope of this IPT is much broader than I thought	Appendix A	Rosemary Beavers	3-Apr	Y	Remove "have been identified" before colon (:), and add before colon (:), "identifies benefits of financial best practices, but does not imply that these are the same benefits that are required for COD)"

## COD Reengineering Options and Analysis Change History Log - Sorted By Page

#	Suggested Changes	Page	Author	Date	Change Made Y/N	Comments
154	*Need the numbers that the text refers to.	Flowchart	Mary Haldane	3-Apr	Y	Flowchart with numbers included
155	Conceptual design - similar to the box labeled in big letters containing "Lender/GA" a box around the authorization system/database/transmit funds to inst. should be labeled in big letters "PELL/DL/CBS"	Flowchart	Rosemary Beavers	3-Apr	Y	"Department" used instead of "PELL/DL/CBS" to be consistent with lefthand side of flowchart
156	Although the document talks about development and implementation, it does not once mention the word testing.	General	Rosemary Beavers	3-Apr	N	Discussed with Rosemary and agreed that comment is noted but no change to document required.
157	No discussion on refunds and how those would be handled....If I were a school I would ask that question.		Linda Paulsen	3-Apr	N	More detailed requirements will be addressed in further analysis. No change to document required

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#	Suggested Changes	Page	Author	Date	Change Made Y/N	Comments
	Comments Incorporated into document	109				
	Comments not incorporated into document	48				
	Total Comments	157				